

Dear Ms. Duff,

Just a couple of comments regarding Energy Star Version 2 Draft:

1) The Single-ply Roofing Industry (SPRI) supports removing references to SRI as we do not feel that this number provides a good way of measuring the combined impact of reflectivity and emissivity.

2) SPRI would encourage EPA to include emissivity in its rating system. Research has shown that products with high emissivity provide net energy savings in all regions except for a very small portion of the country. We are pleased to see that EPA is providing information on the potential benefits of high emissivity and would like to work with the EPA to provide a clear definition of where high emissivity is beneficial and where it is not.

Best regards,

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